

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

DANIELLE SPEARS,

Plaintiff,

VS.

NEXT BRIDGE HYDROCARBONS, INC.,
GREGORY MCCABE, JOHN BRDA,
SECURITIES & EXCHANGE
COMMISSION, FINANCIAL INDUSTRY
REGULATORY AUTHORITY, JANE DOE
1-20, JOHN DO 1-20,

Defendants.

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Case No. 7:24-CV-321-DC-RCG

DEFENDANT BRDA'S UNOPPOSED MOTION TO EXTEND PLEADING DEADLINE

Defendant John Brda files this unopposed motion seeking an extension of his deadline to answer or otherwise respond to Plaintiff's Second Amended Complaint (Doc. 13) and respectfully shows the Court as follows:

1. Plaintiff filed a Complaint on December 6, 2024 (Doc. 1), and an Amended Complaint on December 27, 2024. (Doc. 3)
2. On February 28, 2025, Plaintiff requested an issuance for summons (Doc. 5), which was issued later that same day. (Doc. 7)
3. On March 6, 2025, Mr. Brda was served with the Amended Complaint.
4. After obtaining leave (Doc. 11), Plaintiff filed a Second Amended Complaint, which spans 88 pages and 254 paragraphs, dozens of defendants, with at least 9 causes of action, on March 14, 2025. (Doc. 13)

5. Undersigned counsel is aware of at least three other matters pending before the Court where no responsive pleadings have been filed, with common parties, and common questions of law and fact, which include the following:

- *Willcot v. SEC, et al.*, No. 7:24-cv-317 (W.D. Tex. Dec. 6, 2024);
- *Pease v. SEC, et al.*, No. 7:24-cv-322 (W.D. Tex. Dec. 9, 2024); and
- *Vetrano v. Brda, et al.*, No. 7:24-cv-325 (W.D. Tex. Dec. 9, 2024).

6. Good cause for this extension is made because it would assist in the efficient presentation to the Court of Mr. Brda's defenses, and promote judicial economy.

7. The Court granted a similar extension in *Vetrano* on March 17, 2025, extending Mr. Brda's responsive pleading deadline in that matter to June 16, 2025.

8. Accordingly, Mr. Brda respectfully requests that the Court extend his deadline to answer or otherwise respond to Plaintiff's Amended Complaint to June 16, 2025.

9. This is Mr. Brda's first request for an extension of time.

10. This extension is not sought for purposes of delay, but so that justice may be done.

11. Undersigned counsel conferred with *pro se* Plaintiff; Plaintiff indicated she is unopposed to the requested extension.

[signature page follows]

Dated: March 18, 2025.

Respectfully submitted,

/s/ Jason S. Lewis

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ATTORNEYS FOR DEFENDANT JOHN BRDA

CERTIFICATE OF CONFERENCE

Pursuant to Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant Brda, he conferred with Plaintiff Danielle Spears via telephone and email. Plaintiff has indicated that she is not opposed to the relief requested by this motion.

/s/ Ryan D. Lantry
Ryan D. Lantry

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on March 18, 2025.

/s/ Jason S. Lewis
Jason S. Lewis